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July 9, 2007

FILED ELECTRONICALLY VIA ECF

Honorable George B. Daniels, U.S.D.J.

United States District Court

Southern District of New York

500 Pearl Street

New York, NY 10007

Re: United States v. Gilberto Espinosa
1:07 Cr. 501 (GBD)

Dear Judge Daniels:

I am writing to request that Your Honor's staff schedule a detention hearing in the above-referenced matter as soon as possible.

Please recall that I appeared before Your Honor on June 27, 2007 for the first status conference held in this matter. At that time, I advised Your Honor that my client had been arrested in his hometown of Allentown, Pennsylvania and had been presented in the United States District Court for the Eastern District of Pennsylvania for a Rule 5(c)(3) proceeding on June 11, 2007. On that date, Mr. Espinosa waived his right to a Rule 5(c)(3) hearing and was committed for transfer to New York. Thereafter, Mr. Espinosa was detained in the Lehigh County Jail, until his transfer last week to the custody of the United States Bureau of Prisons, FDC Philadelphia, where he remains in custody.

Mr. Espinosa is a United States citizen with small children. The defense believes that we have a suitable bail package to present that would ensure Mr. Espinosa's return to court. Thus, we request an appearance before Your Honor at the Court's earliest convenience to request that bail package be ordered.

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Respectfully submitted,



Mark I. Cohen, Esq.

Cc: AUSA Michael Maiman

MIC/kls